



# The DeHaan Law Firm P.C.

300 Rabro Drive East ■ Suite 101 ■ Hauppauge, New York 11788 ■ 631.582.1200

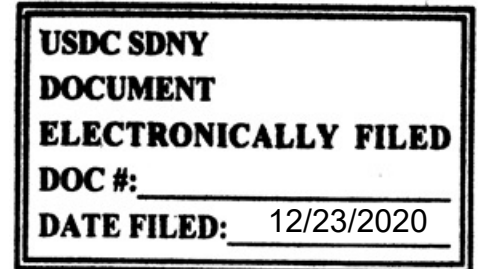
JOHN W. DEHAAN, ESQ.  
WWW.DBDISABILITYLAW.COM  
WWW.FERSDISABILITY.NET

December 23, 2020

**Via ECF**

Hon. Robert W. Lehrburger, U.S. M.J.  
U.S. District Court, S.D.N.Y.  
500 Pearl Street  
New York, NY 10007

**Re: Rodriguez v. Comm'r of Social Security  
Civil Action No. 1:20-cv-05135-PGG-RWL**



Dear Magistrate Judge Lehrburger:

I represent the plaintiff, Daniel Rodriguez, in the above-referenced matter seeking review of the denial of his claim for Social Security benefits. Assistant U.S. Attorney Elizabeth J. Kim represents the Commissioner.

In accordance with Your Honor's Individual Practice Rules, I write to request an adjournment of the briefing schedule in this case, detailed as follows:

	<u>Current Deadline</u>	<u>New Deadline</u>
Plaintiff's Settlement Offer	Jan. 6, 2021	<b>Feb. 5, 2021</b>
Joint Letter Re: Settlement	Feb. 5, 2021	<b>Mar. 8, 2021</b>
Plaintiff to Serve/File Motion	Feb. 5, 2021	<b>Mar. 8, 2021</b>
Defendant to Serve/File Cross/Opp	April 6, 2021	<b>May 6, 2021</b>
Plaintiff's Reply	April 27, 2021	<b>May 27, 2021</b>

I make this request because of multiple intervening deadlines in other cases (arising from delays due to COVID-19) and the upcoming holidays make it impossible for me to review the file to convey a settlement or prepare my moving papers by the current due date. I have consulted with Ms. Kim, and she consents to this request. There have been no prior requests for an adjournment of these deadlines.

Thank you for your consideration of this request.

SO ORDERED:

12/23/2020

HON. ROBERT W. LEHRBURGER  
UNITED STATES MAGISTRATE JUDGE

By:

Respectfully submitted,  
**THE DEHAAN LAW FIRM P.C.**

/s/ John W. DeHaan

John W. DeHaan, Esq.

[jdehaan@dehaan-law.com](mailto:jdehaan@dehaan-law.com)

cc: AUSA Elizabeth J. Kim